

SEALED

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 25-MJ-00052-SMM

FILED BY MB D.C.

May 10, 2025

**ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - FTP**

IN RE:

SEALED COMPLAINT

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? **No**
2. Did this matter involve the participation of or consultation with Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? **No**
3. Did this matter involve the participation of or consultation now Magistrate Judge Marta Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? **No**
4. Did this matter involve the participation of or consultation with Magistrate Judge Ellen F. D'Angelo during her tenure at the U.S. Attorney's Office, which concluded October 7, 2024? **No**

Respectfully submitted,

HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY

By: /s/ Justin L. Hoover
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SEALED

AUSA Justin L. Hoover

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

FILED BY MB D.C.**May 10, 2025**ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - FTPUnited States of America
v.
KALEB HARRISON CHILDS

Case No. 25-MJ-00052-SMM

*Defendant(s)***CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 20, 2025 in the county of Okeechobee in the
Southern District of Florida and elsewhere, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 2422(b)

Enticement of a minor

18 U.S.C. § 2251(a) and (e)

Production of material involving the sexual exploitation of minors

This criminal complaint is based on these facts:

-SEE ATTACHED AFFIDAVIT-

☒ Continued on the attached sheet.*Complainant's signature*

Eric Urgo, Special Agent, HSI

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by videoconference.

Date: May 10, 2025*Judge's signature*City and state: Fort Pierce, Florida

Shaniek Mills Maynard, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Eric Urgo, having been duly sworn, do hereby depose and state as follows:

AGENT BACKGROUND

1. I am a Special Agent (SA) with Homeland Security Investigations (HSI), in Fort Pierce, Florida, and have been employed with HSI since November 2019. Before I joined HSI, I was employed with U.S. Customs and Border Protection (CBP) since 2008. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, I am authorized by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18 of the United States Code.

2. I received formal training at the HSI Special Agent Training Program held at the Federal Law Enforcement Training Center (FLETC), in Glynco, Georgia. I have reviewed numerous examples of child pornography (as defined in 18 U.S.C. § 2256), in all forms of media, and successfully completed specialized trainings related to the investigation of criminal conduct associated with the sexual exploitation of children, and the production, distribution, receipt, and possession of child pornography.

3. As part of my duties as an HSI Special Agent in the Southern District of Florida, I assisted the Okeechobee County Sheriff's Office (OCSO) with its investigation of past sexual abuse allegations involving a minor. Based on the information gathered during this investigation, probable cause exists to arrest Kaleb CHILDS for enticement of a minor, in violation of 18 U.S.C. § 2422(b); and production of material involving the sexual exploitation of minors, in violation of 18 U.S.C. § 2251(a) and (e).

4. I am the federal case agent assigned to this matter, and I am familiar with the facts and circumstances of this investigation. The facts in this affidavit are limited to a determination of probable cause, and as such, I have not included every fact known about this investigation. The facts set forth in this affidavit are based on my personal knowledge, training, and experience; knowledge obtained through communications with other individuals, including other law enforcement officers involved in this investigation; and knowledge gained through a review of the statements, interviews, and physical evidence in this investigation.

PROBABLE CAUSE

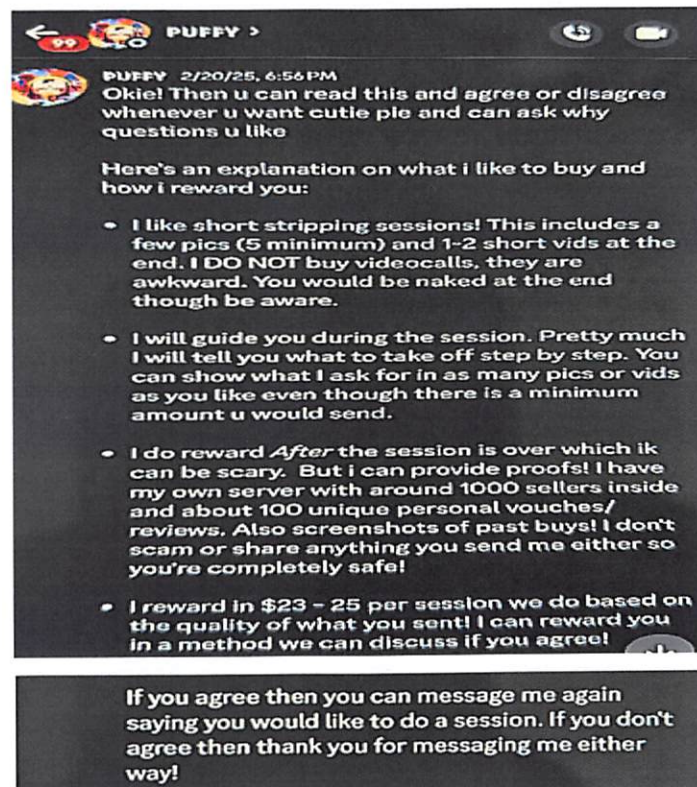
5. On March 26, 2025, while on duty at a middle school in Okeechobee County, Florida, OCSO School Resource Officer (SRO), Deputy B. Griesemer was notified of a lewd and lascivious complaint involving a twelve-year-old female minor victim (MV). MV informed the SRO that she had previously sent and received nude pictures on multiple social media platforms with other individuals, some being adults. One particular social media application (hereinafter referred to as “SMA”) was one of the platforms used by MV to send and receive nude images. SMA is a messaging and communication platform that allows users to create and join online communities known as “servers”. These servers offer text, voice, and video chat capabilities enabling users to connect, share files, and engage in discussions within their communities.

6. MV’s father consented to OCSO searching MV’s phone and turned the device over. Upon review of MV’s SMA account, the OCSO discovered communication with SMA username: puffy5454, ID#1342276921165353091, later determined to be the SMA account belonging to CHILDS, who is currently 25 years old.

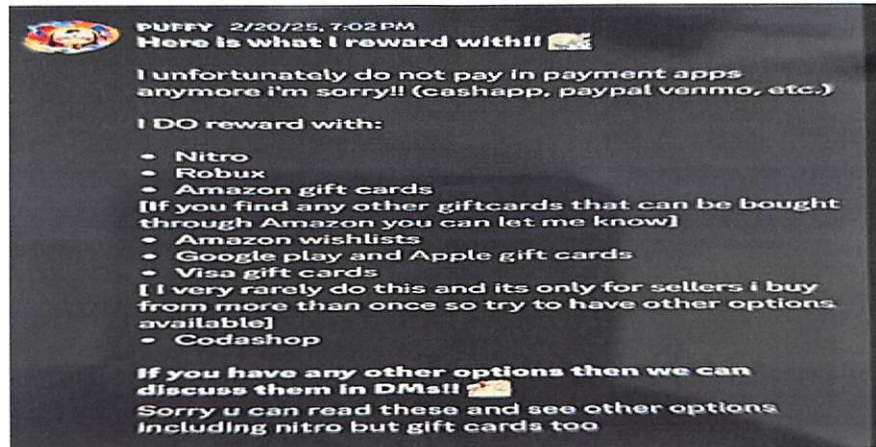
7. On or about February 20, 2025, MV began communicating with CHILDS on SMA and stated that she was 13 years old. CHILDS asked MV to send a verification “selfie” by doing a

specific hand sign to ensure that he was communicating with MV, and MV complied. CHILDS then asked MV what she sells and added that he is an NSFW (Not Safe For Work) buyer. NSFW is commonly used as a warning that a website, picture, video, email attachment, etc. is not suitable for viewing at most places of employment. Typically, this is due to the sexual nature of the content. CHILDS then said *And by nsfw I mean like nudes and stuff U still ok with at?*

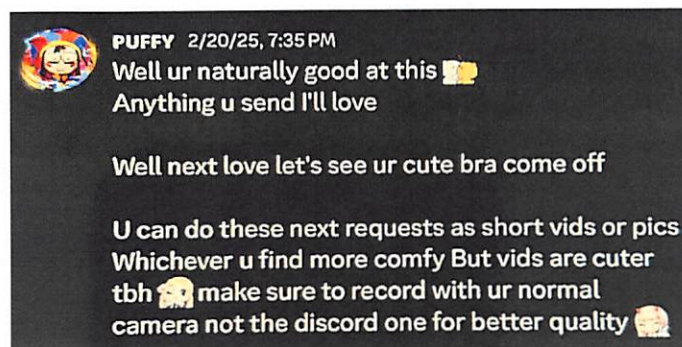
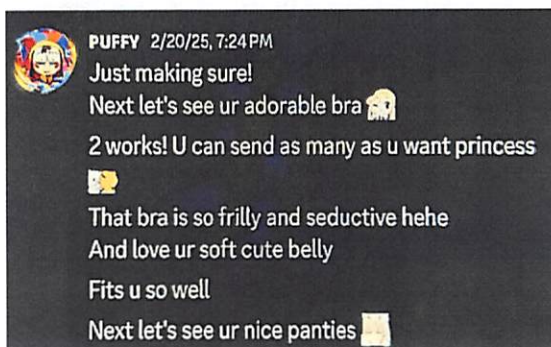
8. On February 20, 2025, CHILDS sent a message to MV referencing whether she agreed or disagreed to his requests, what he likes to buy, and that she will be rewarded after the session. Portions of some of the messages sent by CHILDS included; *I like short stripping sessions, You would be naked at the end though be aware, I will guide you during the sessions!, Pretty much I will tell you what to take off step by step, I do reward AFTER the session is over which ik can be scary.* Below is a screenshot of the messages recovered from MV's phone:

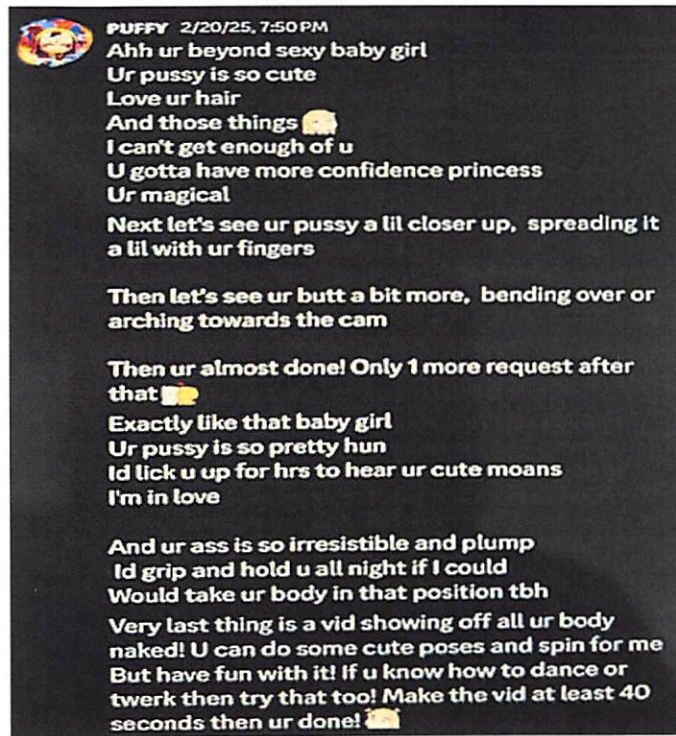
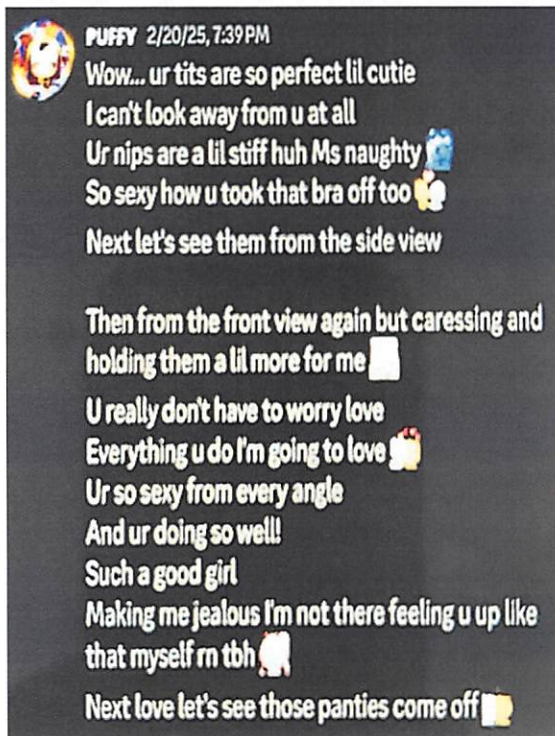


9. MV agreed and said *I think I can do that*, with CHILDS replying, *Awesome! What reward method do u prefer*. CHILDS then provided a list of reward options to include Nitro, Robux, and Amazon gift cards, among others:



10. As the conversation progressed, CHILDS began to provide specific instructions on what type of sexual content he wanted MV to produce. Some of the messages sent by CHILDS included, *Next let's see ur adorable bra*, *Next let's see ur nice panties*, *Well next love let's see ur cute bra come off*. Below are more screenshots from MV's phone:





11. On April 9, 2025, Florida Nineteenth Judicial Circuit Judge Laurie E. Buchanan approved a State search warrant for the suspect SMA account with the date range of February 20, 2025, through March 23, 2025.

12. For the suspect account, SMA provided a billing name of Kaleb CHILDS and a billing address of 1714 Whispering Forest Drive, Apt 106, Charlotte, North Carolina, 28270.

13. Approximately 67 images/videos of MV were provided by SMA, that were found within CHILDS account. The majority of the images/videos are sexual in nature. Below are brief descriptions of some of the images/videos.

- File Name: 1342276921165353091_1342298407326449734_1342298406319689881_SPOILER_IMG_3123.mov, depicts MV fully nude facing the camera, MV is then seen facing away from the camera, bending over with her vagina as the focal point.
- File Name: 1342276921165353091_1342669832138653808_1342669830876303492_SPOILER_IMG_3268.mov, depicts MV fully nude, facing the camera masturbating.
- File Name: 1342276921165353091_1344652378724634696_1344652377147572224_SPOILER_IMG_3705.mov, depicts MV fully nude in the shower, fondling breasts, and rubbing her vagina.

- File Name: 1102333811972374621_1342299093485223957_1342299092826591294_SPOILER_IMG_3122.mov, depicts MV fully nude, legs spread, while spreading open her vagina with her fingers.

14. On April 21, 2025, I interviewed MV. MV recalled communicating with username puffy5454 on SMA, whom she told she was 13 years old and to whom she sent nude images. MV stated that this occurred while she was in Okeechobee County, Florida, which is within the Southern District of Florida.

15. MV stated that she was compensated by the suspect for sending the nude images/videos in the form of SMA “Nitros.” SMA Nitro is a paid subscription service that enhances your SMA experience with various perks. It offers features like HD video streaming, custom emoji and stickers, bigger file sharing, profile personalization, and other benefits. Nitro also includes free server boosts and discounts on additional boosts.

16. Also within the information provided by SMA, pursuant to the State search warrant, was a list of IP addresses used by the suspect. These IP addresses applied to SMA activity on and between February 20, 2025 at 00:15:48 UTC to March 18, 2025, at 17:57:27 UTC. On April 24, 2025, an HSI Summons was submitted to Verizon for subscriber information for some of these IP addresses during the aforementioned date range. One of these IP addresses was 174.210.89.23; the SMA records show the suspect profile used this IP address four times on February 20, 2025, between 16:38:55 UTC and 19:07:53 UTC. During that time frame, the suspect user also used two other IP addresses. This is only hours before the chats pictured above.

17. On May 7, 2025, Verizon responded to the summons. Per the Verizon records, IP address 174.210.89.23 was assigned to mobile phone number 980-230-9938 on February 20, 2025, from 16:23 UTC until 20:02 UTC. However, Verizon was using a “natting” process, meaning that during this time frame, approximately 176 mobile phones were using this IP address.

18. On an unknown date, CHILDS applied for a United States passport and listed his primary contact phone number as 980-230-9938 and his address as 1714 Whispering Forest Drive, Apt 106, Charlotte, North Carolina. That passport was issued in March of 2023.

19. CHILDS and his mother, D.H., booked a cruise for the week of May 4-11, 2025. That cruise left Port Canaveral on May 4, travels to Honduras and Mexico, and then returns to Port Canaveral on May 11, 2025. In that booking, CHILDS listed a phone number of 980-230-9938. The booking listed a different residential address, which is CHILDS' address on his driver's license.

20. On May 7, 2025, an HSI Summons was submitted to Cellco Partnership, d/b/a Verizon Wireless for phone number 980-230-9938, requesting subscriber information. Verizon responded that same day. The subscriber for phone number 980-230-9938 was listed as D.H., who is CHILDS' mother. The device using this phone number is a Samsung. Additionally, the information provided shows that phone number 980-230-9938 was connected to the previously mentioned IP address 174.210.89.23 on multiple occasions.

21. On May 8, 2025, Bank of America responded to an HSI summons and confirmed that CHILDS is a Bank of America employee who works a shift of 2:30 p.m. to 11:00 p.m. Bank of America records show CHILDS with a listed primary contact phone number of 980-230-9938 and an email of derpyenguin5555@gmail.com. This email address was listed as one of the emails within the Verizon records.

22. SMA records show that the suspect account used IP address 171.158.227.254 four times immediately surrounding the conversations in the images pictured above. Those dates and times are:

- February 20, 2025 at 23:06 UTC
- February 21, 2025 at 00:25 UTC

- February 21, 2025 at 00:32 UTC
- February 21, 2025 at 01:23 UTC

23. Bank of America confirmed that the internet service provider for this IP address (171.158.227.254) is Bank of America. Bank of America also stated that this IP address is assigned to a Bank of America building and that employees can have access to this IP address while at the building. Bank of America also confirmed that CHILDS accessed this IP address on February 21, 2025, using a Samsung device, at approximately 4:12 p.m. EST. Further analysis of Bank of America IP and other records is pending.

24. Bank of America information showed one of CHILDS' personal addresses as 1714 Whispering Forest Drive, Apartment 106, Charlotte, NC, 28270, which is the same address listed under the billing information provided by SMA.

25. Bank of America also provided that CHILDS has a bank account with Bank of America and a debit card, ending in 5664, which is the same last four numbers of the card provided in the billing information provided by SMA. Within the bank account activity provided by Bank of America, there are multiple purchases for SMA.

26. In sum, as of now, the following evidence links CHILDS to the suspect SMA user, who enticed MV and produced exploitative images:

- a. The suspect SMA account contains a billing section that lists CHILDS' name, an address he used with his current employer and passport application, and a financial account that Bank of America confirmed is his.
- b. Hours before the conversation pictured above, the suspect SMA user was utilizing IP address 174.210.89.23. During that time, CHILDS' cell phone was one of only 176 mobile Verizon customers using that IP address.

- c. During the time of the conversation pictured above, the suspect SMA user was using an IP address of a Bank of America building. CHILDS is a Bank of America employee and was confirmed to have accessed that IP address within a day of the messages pictured above.

27. Based on the aforementioned facts, there is probable cause that CHILDS committed the offenses of enticement of a minor, in violation of 18 U.S.C. § 2422(b); and production of material involving the sexual exploitation of minors, in violation of 18 U.S.C. § 2251(a) and (e).

FURTHER AFFIANT SAYETH NAUGHT.

Eric Urgo

ERIC URGO, Special Agent
Homeland Security Investigations

Sworn to before me, by video conference, in accordance with the requirements of Rule 4.1 of the Federal Rules of Criminal Procedure, this 10th day of May 2025.

Shaniek Mills Maynard
SHANIEK MILLS MAYNARD
UNITED STATES MAGISTRATE JUDGE

